

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

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STACEY WASHINGTON	)
	)
	)
Plaintiff,	)
	)
v.	)
	)
MONTGOMERY COUNTY	)
	)
Defendant.	)
	)

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**MOTION TO SEAL**

Pursuant to L.R. 105(11), Plaintiff Stacey Washington hereby requests that her Complaint, Docket No. 1, be sealed. Plaintiff has brought forth an action against Montgomery County (“Defendant”) for violations of the Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12101, *et seq.*, Section 504 of the Rehabilitation Act of 1973, 29 U.S.C § 701, *et seq.* (“Rehab Act”), and the Maryland Fair Employment Practices Act (“MFEPA”), Md. Code., State Gov’t § 20-601 *et seq.* Plaintiff requests that the Court seal her complaint so that the disability identified in her pleading remain confidential.

Plaintiff meets the requirements for sealing her Complaint set forth in L.R. 105(11) (“(a) proposed reasons supported by specific factual representations to justify the sealing and (b) an explanation why alternatives to sealing would not provide sufficient protection.”). Plaintiff requests sealing so that any medical diagnosis and/or treatment is not retained in the public record. Alternatives to sealing Plaintiff’s complaint would not provide sufficient protection because her complaint is replete with references to her medical condition and treatment. Therefore, redactions and other alternatives would not offer Plaintiff sufficient protection.

Plaintiff is not seeking to seal her entire case, only her complaint. Accordingly, her request to seal sensitive medical information is not overbroad. *Johnson v. SecTek, Inc.*, Civ. No. ELH-13-03798, 2014 WL 1464378, at \*2 (D.Md. 2014) (citing *Rock v. McHugh*, 819 F.Supp.2d 456, 475 (D.Md. 2011)). In future filings, Plaintiff may be able to file redacted versions of documents related to her case that black out references to the nature of disability and request sealing of individual medical documents. *Id.* Accordingly, Plaintiff's limited request to seal her complaint is appropriate. Therefore, the Court should grant Plaintiff's Motion.

Dated: October 19, 2017

Respectfully submitted,

/s/ Jeremy Greenberg  
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**CERTIFICATE OF SERVICE**

I CERTIFY that, on October 19, 2017, a true and accurate copy of the foregoing was mailed to Defendant via certified mail, restricted delivery:

MONTGOMERY COUNTY  
c/o County Executive Ike Leggett  
101 Monroe Street, 2nd Floor  
Rockville, MD 20850

/s/ Jeremy Greenberg  
Jeremy Greenberg